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CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Haishan Yang

Plaintiff(s),

vs.

Case No. 25-cv-89-JMB/SGE

University of Minnesota

Defendant(s).

**MOTION TO/FOR**

(Provide basis for Motion)

The following party/parties (insert the names of all parties who are filing the Motion): Haishan Yang in the above-named case hereby move(s) the United States District Court, District of Minnesota for an Order to: (state what you want the Court to order)

Requesting a preliminary injunction to prohibit the University of Minnesota (UMN) from enforcing its decision to expel the Plaintiff, pending resolution of the case.

**because:**

(In numbered paragraphs, **briefly** list main reasons the Motion should be granted. Attach additional sheets of paper if necessary; more detail must be provided in a Memorandum of Law accompanying the Motion.)

1. Plaintiff is an international student and a third-year Ph.D. student at UMN, and expulsion would cause immediate and irreparable harm, including the loss of visa status, loss of

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research assistantship (the Plaintiff's primary source of income), and disruption of ongoing academic and professional research collaborations.

2. Plaintiff's expulsion is based on a fundamentally flawed process that violated the Plaintiff's Fourteenth Amendment due process rights. The University relied on altered evidence, denied the Plaintiff adequate time to review critical evidence, and made credibility determinations based on incomplete and manipulated records.
3. The Plaintiff has a substantial likelihood of success on the merits, as the Defendant's actions represent significant procedural violations, including the use of altered ChatGPT evidence without proper disclosure or verification.
4. The balance of equities favors the Plaintiff, as granting this motion will preserve the status quo and allow the Plaintiff to continue pursuing their Ph.D. program without prejudice while the Court reviews the matter.
5. The public interest supports granting this motion to ensure that public universities uphold constitutional due process protections in their disciplinary processes.

Said Motion is based upon the attached Memorandum of Law, forensic analysis by Nick Huntington-Klein (identify all other supporting documents that are being submitted with the Motion, if any) and all of the files, records, and proceedings herein.

Signed this 8th day of January, 2025.

Signature of Party

\_\_\_\_\_

Mailing Address

2136 Ford Parkway #5244

Saint Paul, MN 55116

United States

Telephone Number 4359321198

Note: All parties filing the Motion must date and sign the Motion and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary. The Motion must be served on each party, together with the Notice of Hearing, the Memorandum of Law and other accompanying documents, if any.